

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CAMBRIDGE PLACE INVESTMENT
MANAGEMENT, INC.,

Plaintiffs,

v.

MORGAN STANLEY & CO., INC.;
CITIGROUP GLOBAL MARKETS INC.;
CREDIT SUISSE SECURITIES (USA) LLC;
RBS SECURITIES, INC.; DEUTSCHE
BANK SECURITIES, INC.; MERRILL
LYNCH, PIERCE, FENNER & SMITH, INC.;
UBS SECURITIES LLC; GOLDMAN,
SACHS & CO.; J.P. MORGAN SECURITIES
INC.; COUNTRYWIDE SECURITIES
CORPORATION; FBR CAPITAL
MARKETS & CO., HSBC SECURITIES
(USA), INC.; BANC OF AMERICA
SECURITIES LLC; RESIDENTIAL
FUNDING SECURITIES, LLC; BARCLAYS
CAPITAL INC.; ACCREDITED
MORTGAGE LOAN REIT TRUST; ACE
SECURITIES CORPORATION; AEGIS
ASSET BACKED SECURITIES
CORPORATION; AMERICAN HOME
MORTGAGE ASSETS LLC.; AMERIQUEST
MORTGAGE SECURITIES INC.; ARGENT
SECURITIES INC.; ASSET BACKED
FUNDING CORPORATION; ASSET
BACKED SECURITIES CORPORATION;
BANC OF AMERICA MORTGAGE
SECURITIES, INC.; BCAP LLC; BEAR
STEARNS ASSET BACKED SECURITIES I
LLC; CITIGROUP MORTGAGE LOAN
TRUST INC.; CREDIT SUISSE FIRST
BOSTON MORTGAGE SECURITIES
CORP.; CWABS, INC.; CWALT, INC.; FBR
SECURITIZATION, INC.; FIELDSTONE
MORTGAGE INVESTMENT
CORPORATION; FINANCIAL ASSET
SECURITIES CORP.; FREMONT
MORTGAGE SECURITIES
CORPORATION; GS MORTGAGE

Civil Action No. 1:10-CV-11376-NMG

**AFFIDAVIT OF MATTHEW L. CRANER
IN SUPPORT OF DEFENDANTS' JOINT
MOTION FOR LEAVE TO TAKE
JURISDICTIONAL DISCOVERY AND
TO EXTEND BRIEFING ON
PLAINTIFF'S MOTION TO REMAND**

[CAPTION CONTINUED
ON NEXT PAGE]

SECURITIES CORP.; HIS ASSET
SECURITIZATION CORPORATION; J.P.
MORGAN ACCEPTANCE CORPORATION
I; LONG BEACH SECURITIES CORP.;
MERRILL LYNCH MORTGAGE
INVESTORS, INC.; MORGAN STANLEY
ABS CAPITAL I INC.; MORGAN
STANLEY CAPITAL I INC.; MORTGAGE
ASSET SECURITIZATION
TRANSACTIONS, INC.; NATIONSTAR
FUNDING LLC; NEW CENTURY
MORTGAGE SECURITIES LLC; NEW
CENTURY MORTGAGE SECURITIES,
INC.; NOVASTAR MORTGAGE FUNDING
CORPORATION; PARK PLACE
SECURITIES, INC.; PEOPLE'S CHOICE
HOME LOAN SECURITIES CORP.;
POPULAR ABS, INC.; RESIDENTIAL
ACCREDIT LOANS, INC.; RESIDENTIAL
ASSET MORTGAGE PRODUCTS, INC.;
RESIDENTIAL ASSET SECURITIES
CORPORATION; SACO I INC.; SAXON
ASSET SECURITIES COMPANY;
SECURITIZED ASSET BACKED
RECEIVABLES LLC; STANWICH ASSET
ACCEPTANCE COMPANY, L.L.C.;
STRUCTURED ASSET MORTGAGE
INVESTMENTS II INC.; and
WASHINGTON MUTUAL MORTGAGE
SECURITIES CORP.

Defendants.

I, MATTHEW L. CRANER, being duly sworn, upon my oath depose and say as follows:

1. I am a partner in the law firm of Orrick, Herrington & Sutcliffe LLP (“Orrick”), attorneys for Defendants Barclays Capital Inc., BCAP LLC, and Securitized Asset Backed Receivables LLC. I am member in good standing of the bar of the State of New York. I submit this affidavit in support of Defendants’ Joint Motion for Leave to Take Jurisdictional Discovery and to Extend Briefing on Plaintiff’s Motion to Remand.

2. All of the exhibits annexed hereto were gathered from the website of Perfect Information Ltd. as issued through the Companies Announcement Service of the Irish Stock Exchange and provided by RNS, a news service from the London Stock Exchange. Furthermore, all of the attached exhibits were gathered in New York County, New York at my direction by associates of Orrick, and they were retrieved on October 15, 2010.

3. Annexed hereto as Exhibit A is a true and correct copy of the Notice to Noteholders entitled Notice Relating to Assignment of Certain Claims, dated July 2, 2010, and issued by CAMBER 3 plc to its noteholders.

4. Annexed hereto as Exhibit B is a true and correct copy of the Notice to Noteholders entitled Notice Relating to Assignment of Certain Claims, dated July 12, 2010, and issued by CAMBER 3 plc to its noteholders.

5. Annexed hereto as Exhibit C is a true and correct copy of the Notice to Noteholders entitled Notice Relating to Assignment of Certain Claims, dated July 6, 2010, and issued by CAMBER 4 plc to its noteholders.

6. Annexed hereto as Exhibit D is a true and correct copy of the Notice to Noteholders entitled Notice Relating to Assignment of Certain Claims, dated July 12, 2010, and issued by CAMBER 4 plc to its noteholders.

7. Annexed hereto as Exhibit E is a true and correct copy of the Notice to Noteholders entitled Notice Relating to the Assignment of Certain Claim, dated July 7, 2010, and issued by CAMBER 7 plc to its noteholders.

8. Annexed to my affidavit as Exhibit F is a true and correct copy of the Notice to Noteholders entitled Notice Relating to the Assignment of Certain Claims, dated July 12, 2010, and issued by CAMBER 7 plc to its noteholders.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 18th day of October, 2010.

New York, New York

/s/ Matthew L. Craner
Matthew L. Craner (*admitted pro hac vice*)
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BCAP LLC and Securitized Asset Backed
Receivables LLC*